

1 WRIGHT STANISH & WINCKLER  
2 Karen C. Winckler  
3 Bar No. 2809  
4 200 South 4<sup>th</sup> Street Ste 701  
Las Vegas, Nv. 89101  
Counsel for Alan Rodrigues

5  
6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 ALAN L. RODRIGUES, WESTON J.  
COOLIDGE, and JOSEPH PROKOP,

14 Defendants.

15 Case No.: 2:09-cr-022-RCJ-RJJ

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17 **UNOPPOSED MOTION TO ORDER**  
**THE BANKRUPTCY TRUSTEE TO**  
**PROVIDE ACCESS TO MATERIALS**  
**SEIZED FROM NADN OFFICES**

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19 Karen C. Winckler, counsel for ALAN L. RODRIGUES , Assistant Federal  
20 Public Defender Richard Boulware, counsel for WESTON J. COOLIDGE; and Travis  
21 Shetler, counsel for JOSEPH PROKOP, move this Honorable Court to Order the  
22 Bankruptcy Trustee William Leonard to provide access to materials seized from NADN  
23 offices and to allow the defendants to assist counsel by joining with counsel and/or  
24 paralegals at the Valley View storage unit which contains the seized evidence and is  
25 controlled by Bankruptcy Trustee William Leonard.

26 The Government has no objection to this motion and has agreed to work with the  
27 defendants to retrieve the seized office evidence.

28 This motion is made to allow counsel to review and copy, as needed, the seized  
NADN materials controlled by the Bankruptcy Trustee. To facilitate the review of the  
contents of the seized evidence, we request that the owner of NADN [Coolidge], the

office manager of NADN [Rodrigues] and a sales manager of the product [Prokop] to be allowed to participate in the review of their stored office documents at the storage unit. This will be a saving of both time and money for the defense by using the persons who know how to quickly identify the relevant materials for their defense.

DATED: July 11, 2012

RENE VALLADARES  
Federal Public Defender

## WRIGHT STANISH & WINCKLER

By: \_\_\_\_\_ /s/  
RICHARD BOULWARE  
Assistant Federal Public Defender  
Counsel for Defendant COOLIDGE

By: /s/  
KAREN C. WINCKLER, ESQ.  
Counsel for RODRIGUES

By: \_\_\_\_\_ /s/ \_\_\_\_\_  
TRAVIS SHETLER  
Counsel for Defendant Prokop

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,  
Plaintiff.

Case No.: 2:09-cr-022-RCJ-RJJ

vs.

ALAN L. RODRIGUES, WESTON J.  
COOLIDGE, and JOSEPH PROKOP,  
Defendants.

## Defendants.

Based upon the Motion of the Defendants, and good cause appearing, IT IS  
HEREBY ORDERED that Bankruptcy Trustee William Leonard shall make available the  
seized NADN evidence which he controls . Further, he shall allow defendants Weston  
Coolidge, Al Rodrigues and Joseph Prokop to accompany counsel and/or case  
paralegals to review and copy the evidence.

DATED: ~~July~~ ~~XXXX~~ ~~2012~~ AUG. 15, 2012

Robert J. Boston  
MIRANDA M. D. J.  
District Court Judge

UNITED STATES MAGISTRATE JUDGE

25 submitted by:  
WRIGHT STANISH & WINCKLER  
26 Karen C. Winckler  
Bar No. 2809  
27 200 South 4<sup>th</sup> Street Ste 701  
Las Vegas, Nv. 89101  
28 Counsel for Alan Rodrigues